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9 HEALTH SOLUTIONS, INC.

10 [Additional Counsel Listed on Signature Page]

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 INNOVATIVE HEALTH SOLUTIONS, INC.

16 Plaintiff,

17 vs.

18 DYANSYS, INC., a California corporation,
SRINI NAGESHWAR, individually,
PRODUCTS FOR DOCTORS, INC., a California
corporation, and JAMES BRADFORD,
individually,

19 Defendants.

20 Case No. 3:14-cv-05207-SI

21 **STIPULATION AND [PROPOSED]**
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE

1 Pursuant to Civ. L.R. 6-2, Plaintiff Innovative Health Solutions, Inc. and Defendants
2 Dyansys, Inc., Srini Nageshwar, Products for Doctors, Inc., and James Bradford, (together, the
3 "Parties"), by and through their attorneys of record, enter into this Stipulation and Proposed Order to
4 Continue the Case Management Conference currently set for Friday, September 4, 2015 at 3:00 p.m.
5 in Courtroom 10 on the 19th Floor of the above-captioned court, before the Honorable Judge Susan
6 Illston.

7 The Parties are in the process of attempting to negotiate an agreement to resolve this case.
8 Accordingly, the Parties have stipulated to continue the Case Management Conference to provide the
9 parties with sufficient time to attempt to negotiate a settlement.

10 The Parties request that the Court continue the Case Management Conference in this matter to
11 October 16, 2015, at 3:00 p.m., with joint case management statements to be filed with the Court by
12 October 9, 2015. In the event settlement is reached by the parties and dismissals are filed with the
13 Court on or before October 9, 2015, the Case Management Conference will automatically be
14 removed from the Court's calendar.

15 **IT IS SO STIPULATED.**

16 Dated: August 21, 2015

Respectfully submitted,

17 By:

18 /s/ Ranjini Acharya

19 L. Scott Oliver (SBN 174824)

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Dated: August 21, 2015

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Attorneys for Defendants DYANSYS, INC.,
and SRINI NAGESHWAR.

Dated: August 21, 2015

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Attorneys for Defendants PRODUCTS FOR
DOCTORS, INC. and JAMES BRADFORD

CERTIFICATION PURSUANT TO CIV. L.R. 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), I hereby certify that concurrence in the filing of this document has been obtained from the signatories for whom a signature is indicated by a conformed signature (/s/). I have on file records to support this concurrence for production for the Court if so ordered.

Dated: August 21, 2015

/s/ Ranjini Acharya
Ranjini Acharya

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The Case Management Conference currently scheduled for September 4, 2015 is continued to October 16, 2015 at 3:00 p.m. In the event settlement is reached by the parties and dismissals are filed with the Court on or before October 9, 2015, the Case Management Conference will automatically be removed from the Court's calendar.

Dated: 8/24/15

By:

Susan Illston

United States District Court Judge

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25 Attorneys for Plaintiff INNOVATIVE HEALTH
26 SOLUTIONS, INC.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 INNOVATIVE HEALTH SOLUTIONS, INC.

21 Case No. 3:14-cv-05207-SI

22 Plaintiff,

23 vs.
24 **DECLARATION OF RANJINI ACHARYA
25 IN SUPPORT OF STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
CASE MANAGEMENT CONFERENCE**

26 DYANSYS, INC., a California corporation,
27 SRINI NAGESHWAR, individually,
28 PRODUCTS FOR DOCTORS, INC., a California
corporation, and JAMES BRADFORD,
individually,

Defendants.

1 I, Ranjini Acharya, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and am a
3 member of the bar of this Court. K&L Gates LLP represents Plaintiff Innovative Health Solutions,
4 Inc. in this litigation. I submit this declaration on behalf of Plaintiff and in support of the Stipulation
5 and [Proposed] Order to Continue the Case Management Conference, filed herewith. The statements
6 made in this declaration are based on my own personal knowledge and if sworn as a witness I could
7 testify competently thereto.

8 2. Plaintiff Innovative Health Solutions, Inc. and Defendants Dyansys, Inc., Sriniv
9 Nageshwar, Products for Doctors, Inc., and James Bradford, (together, the “Parties”) are attempting
10 to negotiate a settlement agreement to resolve all remaining issues in the case including Plaintiff’s
11 claims for damages, royalties, and costs claimed in the lawsuit against Defendants.

12 3. The Parties agree that continuing the Case Management Conference, currently set for
13 Friday, September 4, 2015 at 3:00 p.m., to October 16, 2015, at 3:00 p.m., will provide the Parties
14 with sufficient time to attempt to negotiate a settlement.

15 4. The Parties further agree that, in the event settlement is not reached, a joint case
16 management statement will be filed with the Court by October 9, 2015. In the event that settlement is
17 reached and dismissals are filed with the Court on or before October 9, 2015, the Case Management
18 Conference will automatically be removed from the Court’s calendar.

19 5. This request affects only the hearing date for the Case Management Conference and
20 the deadline for filing the joint case management statement thereto. It does not affect the rest of the
21 case schedule.

22 6. Defendants previously sought, and were granted, an extension of time to file a reply in
23 support of Defendants’ Motion to Dismiss. (Dkt. 108). The Parties also sought, and were granted,
24 one extension of time to continue the initial case management conference. (Dkt. 94).

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2 I declare under penalty of perjury under the laws of the United States of America that the foregoing is
3 true and correct and that this declaration was executed on this 21st day of August, 2015, at Palo Alto,
4 California.

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6 By: /s/ Ranjini Acharya
Ranjini Acharya

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